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27 *Attorneys for Plaintiff,*
28 Schuyler Hoffman

1 **UNITED STATES DISTRICT COURT**
2 **SOUTHERN DISTRICT OF CALIFORNIA**

3 **SCHUYLER HOFFMAN,
4 INDIVIDUALLY AND ON
5 BEHALF OF ALL OTHERS
6 SIMILARLY SITUATED,**

7 Plaintiff,

8 v.

9 **BANK OF AMERICA, N.A.,**

10 Defendant.

11 **Case No.: 3:12-cv-539 JAH (DHB)**

12 **JOINT STIPULATION
13 WITHDRAWING OBJECTOR
14 SUSAN HOUSE'S OBJECTION TO
15 PLAINTIFF'S MOTION FOR FINAL
16 APPROVAL AND MOTION FOR
17 ATTORNEYS' FEES**

18 **HON. JOHN A. HOUSTON**

19 ///

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1 WHEREAS, this Court preliminarily approved Plaintiff SCHUYLER
2 HOFFMAN (“Hoffman”) and Defendant BANK OF AMERICA, N.A.’s (“BofA”)
3 class settlement on February 13, 2014. [ECF No. 48];

4 WHEREAS, Objector SUSAN HOUSE (“House”) lodged an objection to the
5 Parties class settlement on August 21, 2014. [ECF No. 55];

6 WHEREAS, Hoffman and BofA moved for Final Approval of the class
7 settlement on August 25, 2014. [ECF No. 56];

8 WHEREAS, House lodged an Opposition to the Parties’ Final Approval
9 Motion on September 10, 2014. [ECF No. 58];

10 WHEREAS, Class counsel met and conferred with House and House’s
11 counsel before Judge Hoffman (Ret.) to discuss the issues addressed in House’s
12 Opposition;

13 WHEREAS, Class counsel agreed to extend the Claims period and post all
14 motions for approval and fees on the settlement website upon Court approval;

15 WHEREAS, Class counsel established that no conflict of interest exists in this
16 matter and after such meet and confer, House is fully satisfied that no such conflict
17 exists, specifically as it relates to any of her objections;

18 WHEREAS, House believes that the issues addressed in House’s Objection
19 are now remedied;

20 WHEREAS, Class counsel agree that extending the claims period to October
21 21, 2014 and any claims up to that date will be deemed as timely claims with Court
22 Approval, and posting the fee and approval motions on the settlement website have
23 benefited the class; and,

24 WHEREAS, House now agrees to withdraw all House’s Objections to the
25 Parties class settlement.

26 IT IS HEREBY STIPULATED by and between the Parties, through their
27 respective counsel of record, that:

28 1. All of House’s Objections to the class settlement (ECF No. 55) are hereby

withdrawn;

2. The claims period be extended until October 21, 2014 upon Court approval; and,
3. House's Opposition to the class settlement (ECF No. 58) is hereby withdrawn;
4. Any additional costs related to the upkeep of the website and administrative costs for the extended claims period shall come from the Settlement Fund; and
5. House, Hoffman and Bank of America respectfully request this Court finally approve the Parties' class settlement.

Dated: September 26, 2014

Respectfully submitted,

KAZEROUNI LAW GROUP, APC

By: /s/ Abbas Kazerounian
ABBAS KAZEROUNIAN, ESQ.
ATTORNEY FOR PLAINTIFF

REED SMITH LLP

By: /s/ Felicia Yu
FELICIA YU, ESQ.
ATTORNEY FOR DEFENDANT

LAW OFFICES OF DARRELL PALMER PC

By: /s/ Joseph Darrell Palmer
JOSEPH DARRELL PALMER, ESQ.
ATTORNEY FOR OBJECTOR

1 IT IS THE RECOMMENDATION OF HONORABLE HERBERT B. HOFFMAN (RET.)
2 THAT THIS JOINT STIPULATION BE APPROVED BY THIS HONORABLE COURT

3 JUDICATE WEST
4

5 By: 
6 HONORABLE HERBERT B. HOFFMAN (RET.)

7
8 **SIGNATURE CERTIFICATION**

9 Pursuant to Section 2(f)(4) of the Electronic Filing Administrative Policies
10 and Procedures Manual, I hereby certify that the content of this document is
11 acceptable to Joseph Darrell Palmer, Esq.; and, Felicia Yu, Esq. and that I have
12 obtained Mr. Palmer; and, Ms. Yu's authorization to affix their electronic
13 signatures to this document.

14 Dated: September 26, 2014

15 **KAZEROUNI LAW GROUP, APC**

16 By: /s/ Abbas Kazerounian
17 ABBAS KAZEROUNIAN, ESQ.
18 ATTORNEY FOR PLAINTIFF